

# WHITMOYER LABORATORIES, INC.

19 NORTH RAILROAD STREET • MYERSTOWN, PENNSYLVANIA 17067 • PHONE (717) 866-2151

November 22, 1978

135365

Mr. Narendra N. Desai  
Air Pollution Control Engineer  
Department of Environmental Resources  
407 South Cameron Street  
Harrisburg, PA 17120

Dear Mr. Desai:

Attached please find a monthly summary report of our emissions for October in relation to our Temporary Operating Permit No. 38-313-010. We find it to be considerably difficult in actual daily plant operation to make varying acid additions to the evaporator in such a way as to try to maintain a final stack discharge pH of 6.0 - 6.1. I would bring to your attention in particular the samplings of the 23rd and 30th. In these two cases we were able to achieve a final stack pH of 6.0, however, we still exceeded the aniline limits. On the 23rd we added sufficient acid to the evaporator to lower its pH to 1.0 @ 328 gph; and on the 30th, pH was adjusted in evaporator to 1.2 @ only 234 gph.

If you have any suggestions as to how we might better operate the system in order to meet the limits, please let me know.

Upon taking a closer look at the limits on the attached sheet, we would question the following. The peak arsenic limit is 2.5 times the average limit. The peak chlorides limit is 2.86 times its average limit. But, the peak aniline limit is only 1.3 times the average limit. Mr. Weiss and yourself told us previously that your department felt that arsenic was the primary toxic substance causing the vegetation damage. In view of all of the above, it does not seem consistent to have such a small difference between peak and average aniline limits.

We would also like to let you know that we have completed settlement, out-of-court, with Mr. and Mrs. Harold Grumbine in relation to the damages we incurred to their cornfield. We have not had any other requests for damages. Mr. Grumbine has still been telling us, in spite of the attached numbers, that he is not able to detect any odors.

In conclusion, we would still respectfully request an increase of the aniline limits.

Attachments

cc: J.P. Grab  
H.M. Huffman  
T.E. Long  
R.S. Rosera

Sincerely,

*Lloyd J. Croesus*  
Lloyd J. Croesus  
Safety & Environmental Manager

AR100339

MONTHLY SUMMARY OF EMISSIONS: ARSENICAL WASTE EVAPORATION SYSTEM: DER APPLICATION NO. 38-313-010

All values (except pH) are lbs./hr.

Date: October - 1978

DATE OF SAMPLING	4th	6th	10th	14th	18th	20th	23rd	26th	30th	MONTHLY MEANS	MONTHLY MEANS LIMITS				
pH of Final Stack Emissions limit = 6 to 9	6.95	SYSTEM SHUT-DOWN FOR MAINTENANCE WORK					6.3	6.9	6.6	6.4	6.05	6.6	6.0	6.48	6 to 9
Total Arsenic Max. limit = 0.1 #’s/hr.	0.007		0.012	0.013	0.013	0.070	0.029	0.008	0.096	0.031	0.04				
Aniline Max. limit = 16 #’s/hr.	28.46		13.2	27.5	20.1	28.78	19.26	25.6	27.4	23.79	12				
Total Chlorides Max. limit = 1.2 #’s/hr.	0.178		0.28	0.35	0.19	0.26	0.49	0.457	0.70	0.36	0.42				